



MOBBING PREVENTION POLICY

1. PURPOSE

This Mobbing Prevention Policy (the “**Policy**”) sets out the approach of Mavi Giyim San. ve Tic. A.Ş. (“**Mavi**”) to Mobbing and establishes the principles and standards of conduct for preventing Mobbing in the workplace.

2. SCOPE

This Policy applies to:

- Mavi Management;
- Mavi managers and employees;
- Mavi's affiliates and subsidiaries, and the members of the Boards of Directors, country directors, managers and employees of such affiliates and subsidiaries; and
- All representatives acting in the name and on behalf of the Company, including suppliers, manufacturers, subcontractors, distributors, consultants, etc. (each a "Business Partner" and collectively, "Business Partners"), and the employees of Business Partners.

3. DEFINITIONS

Mavi: Means, collectively and individually, Mavi Giyim Sanayi ve Ticaret A.Ş. and the affiliates and subsidiaries of Mavi Giyim Sanayi ve Ticaret A.Ş.

Mavi Management : Means, collectively and individually, the members of the Board of Directors, the CEO and managers with administrative responsibility reporting to the CEO of Mavi Giyim Sanayi ve Ticaret A.Ş., as well as the most senior managers with administrative responsibility or country directors authorized to represent the affiliates and subsidiaries of Mavi Giyim Sanayi ve Ticaret A.Ş.

Department Executives: Means the executives of the departments within Mavi’s internal organization, as specified in the Internal Organization Directive, who carry out their activities under the Chief Executive Officer.

Workplace : For the purposes of this Policy, Workplace includes all places where an employee performs work or is present for work-related reasons. Accordingly, in addition to the headquarters and retail stores, Workplace includes:

- Any public or private place where work is actually carried out;
- Common areas used by the employee during rest or meal breaks, including toilets, washing facilities and changing rooms;
- Places attended during work-related travel, transportation, training, meetings, events and social activities;
- All work-related written, verbal or electronic communications conducted through information and communication technologies;
- Accommodation provided by the employer; and
- The employee's commute to and from work using personnel transportation services provided by the employer.

Mobbing : Mobbing (psychological harassment) means the totality of intentional and malicious attitudes and conduct systematically directed, over a substantial and reasonable period, by one or more persons in the workplace against one or more persons working in the same workplace, with the aim of intimidating, exerting pressure on, marginalizing or removing them from the workplace. Such conduct must be capable of harming the personality rights, professional reputation, working conditions, social relationships, and/or physical or mental health of the victim or victims.

Hierarchical Mobbing : Hierarchical Mobbing (psychological harassment) means a form of psychological harassment within a hierarchical relationship in the workplace, directed from a superior to a subordinate or from a subordinate to a superior, and which may occur unilaterally or mutually.

Peer Mobbing : Peer Mobbing (psychological harassment) means a form of psychological harassment perpetrated against one another by employees at the same hierarchical level or within the same position, title or status group in the workplace.

Ethics Line Channels : Ethics Line channels mean the telephone line(s) or website(s), operated by a third party/third parties completely independent from Mavi through which misconduct identified or witnessed in Türkiye and other countries may be reported, concerns may be raised verbally or in writing, and questions may be asked, with access to a support line available 24/7. The Ethics Line can be accessed via the dedicated website at www.maviethicsline.com / www.mavietikhat.com.

4. GENERAL PRINCIPLES AND IMPLEMENTATION

4.1 Principles, Commitments and Related Practices

4.1.1 Respectful and Safe Working Environment

It is essential to establish and maintain a safe, healthy and supportive working environment within Mavi in which the dignity, personality rights and privacy of employees are respected. Attitudes and conduct that may cause employees to feel under pressure in the workplace are not permitted.

4.1.2 Equality, Inclusion and Respect for Human Dignity

At Mavi, differences among people are valued, and employees are expected to receive equal treatment and work under conditions consistent with human dignity, irrespective of their individual characteristics or their role, title or status. Respect for human dignity is a fundamental principle in employment relations, and exclusionary, discriminatory, humiliating, demeaning or intimidating attitudes and conduct have no place in the working environment.

4.1.3 Zero Tolerance for Mobbing

Mavi adopts a zero-tolerance approach to all conduct constituting Mobbing, including Peer Mobbing and Hierarchical Mobbing. Such conduct is strictly prohibited and will not be tolerated. Reports concerning Mobbing received by Mavi are addressed without delay in accordance with internal policies and procedures and applicable legislation.

4.1.4 Protection of Confidentiality

The private lives and personal data of the persons concerned are respected throughout the reporting, investigation and assessment processes relating to Mobbing. Confidentiality is protected at every stage of the process; information obtained is shared only to the extent necessary and only with authorized persons, in accordance with internal policies and procedures and applicable legislation.

4.1.5 Prohibition of Retaliation

No retaliation is permitted against persons who report Mobbing or similar adverse conduct, witness such conduct, or support investigation processes. Mavi ensures that such persons are not subjected, directly or indirectly, to adverse treatment because of their reports, and does not tolerate attempted retaliation. A reporting person may not be demoted, subjected to disciplinary action, dismissed, have their salary reduced, have their duties changed, or face similar consequences for reporting victimization, a safety concern, a management weakness, abuse of duty or authority, or a breach of legislation; provided, however, that sanctions may be imposed for the reporting person's own misconduct or where it is established that the reporting person knowingly made a false statement or did so with the intent to cause harm.

4.1.6 Preventive Measures

To prevent all forms of Mobbing in the Workplace, including Peer Mobbing and Hierarchical Mobbing, preventive measures are identified in cooperation with the relevant business units and integrated into Mavi's business processes through the mechanisms set out below.

4.2 Training and Communication

Mavi adopts a comprehensive and continuous training and communication approach to prevent Mobbing, raise employee awareness and embed appropriate standards of conduct. Through various communication channels, the Legal and Compliance Division and the Human Resources Division support employees in adopting and internalizing the legal regulations concerning Mobbing, internal policies and procedures, Mavi's approach to Mobbing within the framework of good corporate governance practices, and ethical principles.

4.2.2 Monitoring

The Legal and Compliance Division and the Human Resources Division conduct regular monitoring and assessment activities to determine whether the standards of conduct and principles set out in this Policy are being observed, with a view to preventing Mobbing or mitigating its effects in the Workplace. The Legal and Compliance Division and the Human Resources Division also periodically review this Policy and the measures implemented to prevent Mobbing and assess whether different and more effective preventive measures can be developed.

4.2.3 Reporting Violations and Sanctions

Any conduct constituting Mobbing that is contrary to this Policy or applicable legislation shall be reported to Mavi, in accordance with the Whistleblowing Policy, through the Ethics Line Channels or directly, verbally or in writing. Employees are responsible not only for their own conduct but also for the inappropriate conduct of managers and colleagues. Accordingly, witnessed Mobbing must be reported regardless of the identity of the perpetrator.

Investigations are conducted in accordance with objective criteria and the Company's internal regulations, subject to the principle of confidentiality. If the reported conduct is determined to constitute Mobbing, disciplinary sanctions may be imposed depending on the circumstances of the violation, ranging from training, refresher training or a reduction in performance appraisal rating to termination of the employment contract for just cause. Disciplinary sanctions also apply to persons who approve or direct the conduct giving rise to the violation, or who are aware of such conduct and fail to make the required report.

5. RESPONSIBILITIES

5.1 Responsibility of Mavi Management

Mavi Management takes all necessary steps to prevent Mobbing in the Workplace in accordance with this Policy, other internal policies and procedures, and applicable legislation. In this context, Mavi Management is ultimately responsible for ensuring the implementation and effective application of internal policies and procedures, taking preventive measures, periodically assessing the Policy and the measures implemented, and ensuring that they are updated.

5.2 Responsibilities of Department Executives

Within the scope of their duties and authority, Department Executives are responsible for creating a safe, respectful and inclusive working environment for employees in their areas of responsibility. It is unacceptable for Department Executives to cause or tolerate Mobbing. Accordingly, they are expected to provide the information and guidance necessary to ensure that employees in their areas of responsibility act in accordance with the Policy.

5.3 Responsibilities of Employees

To establish and maintain a respectful, safe, healthy and supportive working environment, all Mavi employees must comply with the rules, standards of conduct and principles set out in this Policy. Accordingly, they must refrain from all exclusionary, discriminatory, humiliating, demeaning or intimidating attitudes and conduct that may give rise to Mobbing. Any person who is subjected to or witnesses such conduct is also expected to report it in accordance with the Whistleblowing Policy.

6. EFFECTIVE DATE AND ADMINISTRATION

This Policy is prepared and periodically reviewed by Mavi's Legal and Compliance Division and the Human Resources Division.

If there is any discrepancy between this Policy and the local legislation of the relevant country, Mavi's policies and procedures shall apply to the extent that they do not conflict with local legislation.

RELATED DOCUMENTS / RECORDS

HO.PO.01 Mavi's People and Its Principles

LC.PO.02 Compliance Policy

HO.PO.04 Human Rights Policy

HO.PO.06 Diversity and Inclusion Policy

LC.PO.01 Whistleblowing Policy